

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

ALLISON SCHULTZ, individually, and
on behalf of all others similarly situated.,

Plaintiff,

v.

Case No. 5:23-cv-00030-KDB-SCR

PLANET AUTOMOTIVE GROUP, LLC., *et al.*

Defendants.

**SECOND CONSENT MOTION FOR EXTENSION OF TIME FOR
DEFENDANT HELM TECHNOLOGIES, LLC TO RESPOND TO
SECOND AMENDED CLASS ACTION COMPLAINT**

Defendant Helm Technologies, LLC (“Defendant”), with the consent of Plaintiff, and in accordance with Local Rule 7.1, respectfully moves for a 14-day extension of time until and including January 25, 2024, to move, plead, or otherwise respond to the Second Amended Class Action Complaint (the “Complaint”). The reasons in support of this Consent Motion are as follows:

1. Defendant was served with the Summons and Complaint on or about November 21, 2023.
2. The Court granted Defendant until and including January 11, 2024, to file a responsive pleading to the Complaint.
3. Counsel for all parties in this lawsuit are engaged in active discussions concerning a potential resolution of this matter, but additional time is still needed for counsel to confer with their clients and continue further discussion among themselves. Additional time to file a responsive pleading will help facilitate those discussions.
4. Plaintiff’s counsel, Christopher E. Roberts, has consented to the requested extension of time.

5. This Consent Motion is not intended to cause unnecessary delay and is not filed for any other improper purpose.

WHEREFORE, Defendant Helm Technologies, LLC respectfully moves for an extension of time until and including January 25, 2024, to move, plead, or otherwise respond to the Second Amended Class Action Complaint.

Respectfully submitted,

CLARK HILL PLC

By: /s/ Christopher B. Clare
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Dated: January 5, 2024

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2024, I electronically filed the above with the Clerk of Court using the CM/ECF System, which will provide electronic copies to counsel of record.

s/ Christopher B. Clare